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WeWoreWhat LLC, Onia, LLC Danielle
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Carbon 38, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CV COLLECTION LLC, a New York
limited liability company, d/b/a The Great
Eros,

Plaintiff,

vs.

WEWOREWHAT, LLC, et al.,
Defendants.

Case No. 2:20-cv-10290-RGK-AS

**DECLARATION OF CHRISTINA
GOODRICH IN SUPPORT OF
STIPULATION AND REQUEST FOR
AN ORDER TO CONTINUE
HEARING ON DEFENDANTS
WEWOREWHAT LLC, ONIA, LLC,
AND DANIELLE BERNSTEIN'S
MOTION TO DISMISS, STAY, OR
TRANSFER**

[Assigned to the Honorable R. Gary
Klausner]

Current Hearing Date: March 1, 2021
New Hearing Date: March 15, 2021

DECLARATION OF CHRISTINA N. GOODRICH

I, Christina N. Goodrich, declare as follows:

1. I am an attorney duly authorized to practice law before the courts of the State of California and this Court. I am a partner with the law firm of K&L Gates LLP (“K&L Gates” or the “Firm”), attorneys for Defendants WeWoreWhat LLC, Onia, LLC, Danielle Bernstein, Saks Fifth Avenue, and Carbon 28, Inc. in the above-captioned matter. I am familiar with the file in this matter, including the filings, discovery, correspondence, and evidence, all of which are maintained in the Firm’s records in the ordinary course of business. I have personal knowledge of the facts set forth herein and could and would testify competently thereto if called upon to do so.

2. Good cause exists to continue the hearing on Defendants WeWoreWhat LLC, Onia, LLC, and Danielle Bernstein’s (collectively, “Defendants”) Motion to Dismiss, Stay, or Transfer, including because such a continuance is likely to moot such Motion, thereby rendering a ruling on the Motion unnecessary and conserving this Court’s resources.

3. As set forth in the Motion, there is a currently pending action in the Southern District of New York, captioned as *WeWoreWhat, LLC and Onia, LLC v. CV Collection, LLC d/b/a The Great Eros*, Case No. 1:20-cv-08623. Defendants’ Motion sought to transfer or stay this Action based upon the existence of that action.

4. The Parties in this Action have now engaged in discussions regarding a potential agreement to transfer this Action. If the Parties reach such an agreement, Defendants’ Motion will be moot, and this Court will not be required to rule on it.

5. In the interest of conservation of judicial resources, therefore, the Parties believe a continuance of the Hearing on Defendants’ Motion is appropriate.

6. The Parties have also agreed that Defendants’ deadline to file a Reply Brief should be continued and set based on the new requested hearing date of March 15, 2021.

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Executed this 11th day of February, 2021 in Redondo Beach, California.

Christina N. Goodrich